

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re: Denise M Hewitt, <div style="text-align: right;">Debtors</div> KelDon I LLC <div style="text-align: right;">Movant</div> v. Denise M Hewitt <div style="text-align: right;">Debtors/Respondent</div> William C. Miller, Esquire <div style="text-align: right;">Trustee/Respondent</div>	Bankruptcy No. 2:20-bk-11075 Chapter 13 Related to Doc. No. 2
--	---

**KELDON I LLC’S OBJECTION TO CONFIRMATION OF DEBTORS’ CHAPTER 13
PLAN**

Secured creditor, KelDon I LLC, (“KelDon”), by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtors, Denise M Hewitt, and in support thereof alleges as follows:

1. Debtors, Denise M Hewitt (“Debtors”), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 21, 2020.
2. KelDon holds a security interest in the Debtor’s real property located 9347 Edmund Street, Philadelphia, PA 19114 (the “Property”), by virtue of a Mortgage recorded with the Commissioner of Records of the City of Philadelphia on February 12, 2007 in Document ID Number 51630242, which has ultimately been assigned to KelDon.
3. Said Mortgage secures a Note in the amount of \$160,000.00.

4. On February 21, 2020, Debtor filed a Chapter 13 Plan (the "Plan"). A true and correct copy of the Plan is attached hereto as Exhibit "A."
5. The Plan fails to include treatment of Secured Creditor's claim. The subject property and claim are, however, listed in Debtor's schedules. Secured Creditor objects to the Plan and seeks clarification as to Debtors' intentions in regard to the subject property and claim.
6. Thus, the Plan is unclear, as therefore, infeasible.
7. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) KelDon I LLC hereby objects to Debtors' proposed Plan due to the fact that the treatment of Secured Creditor's Claim is not accounted for in the Plan filed by the Debtor. See 11 U.S.C.A. § 1322(b)(3) and (b)(5).

WHEREFORE, Secured creditor, KelDon I LLC, respectfully requests that this Court not confirm Debtors' Chapter 13 Plan.

Respectfully Submitted,
RAS Crane, LLC
Attorney for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone: 470-321-7112
Facsimile: 404-393-1425

By: /s/Brandon Pack
Brandon Pack, Esquire
Pennsylvania Bar Number 311976
Email: bpack@rasnj.com

Date: April 14, 2020

UNITED STATES TRUSTEE
OFFICE OF THE U.S. TRUSTEE
200 CHESTNUT STREET
SUITE 502
PHILADELPHIA, PA 19106

Respectfully Submitted,

RAS Crane, LLC
Attorney for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone: 470-321-7112
Facsimile: 404-393-1425

By: /s/Brandon Pack
Brandon Pack, Esquire
Pennsylvania Bar Number 311976
Email: bpack@rasnj.com

Date: April 14, 2020